

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

KIRBY INLAND MARINE, LP

§§§§§§§§§§

Plaintiff,

Civil Action No. 3:19-cv-00207

V.

**FPG SHIPHOLDING PANAMA
47 S.A., K LINE ENERGY SHIP
MANAGEMENT, and the VLGC**

Defendants,

8

**IN THE MATTER OF KIRBY
INLAND MARINE, LP, in a
Cause of exoneration from or
Limitation of liability**

Rule 9(h) Admiralty

Demand for Jury Trial

**AGREED MOTION FOR CONTINUANCE OF DEADLINES FOR DISPOSITIVE
MOTIONS AND MOTIONS TO EXCLUDE EXPERT OPINION EVIDENCE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, liaison counsel for the OPA Claimants, and file this Agreed Motion for Continuance, and in support thereof would respectfully show as follows:

OPA claimants and FPG Shipholding Panama 47 S.A., Ship No. 138 Co. Ltd., Ship No. 139 Co. Ltd., Genesis River Shipping, S.A., and “K” Line Energy Ship Management Co., Ltd. (the “Genesis River Interests”), jointly **agree** and request an extension of the deadline for Dispositive Motions and Motions to Exclude Expert Opinion Evidence in this matter be moved **from December 3, 2021 [ECF No. 596] to December 9, 2021**, as reflected by the attached Proposed Order. The parties have completed the expert depositions at issue, and have just recently obtained transcripts from the most recent depositions. The parties also note that this matter is scheduled for mediation on Monday, December 13, and the parties are actively

engaged in preparations for same. This request for a brief, six-day extension of the current deadline is respectfully requested to permit the parties sufficient time to complete these preparations and activities.

Respectfully submitted,

By: /s/ Dimitri P. Georgantas *

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Liaison Counsel for Claimants

(* Signed with permission)

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court for the United States District Court for the Southern District of Texas via the CM/ECF System, which provides notice to all counsel of record.

/s/ William Dills
William Dills

CERTIFICATE OF CONFERENCE

I hereby certify that I have consulted with counsel for all parties concerning this motion and the Motion is agreed.

/s/ William Dills
William Dills